

Presentment Date:
December 31, 2024 at 10:30 A.M.

Objection Date:
December 24, 2024

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

In re:
FRALEG JEFFERSON CORP,
dba Fraleg Quincy Corp,
dba 931 Lincoln Place Corp,

Debtor.

Case No.: 24-41125-ess

Chapter 11

**NOTICE OF PRESENTMENT OF MOTION FOR AN ORDER PURSUANT
TO SECTION 327, 330 AND 331 OF THE BANKRUPTCY CODE
AUTHORIZING THE DEBTOR TO EMPLOY LAW OFFICES OF
FRANCIS E. HEMMINGS PLLC AS COUNSEL FOR THE DEBTOR**

PLEASE TAKE NOTICE, that upon the annexed motion and order authorizing the Debtor in possession to employ and compensate Law offices of Francis E. Hemmings PLLC as Counsel for the Debtor (the “Motion and Order”) will present to the honorable Elizabeth S. Strong, United States Bankruptcy Judge for the Eastern District of New York - Brooklyn Division, 271-C Cadman Plaza East - easy 3585, Brooklyn, NY 11201 (the “Bankruptcy Court”), for signature on **December 31, 2024 at 10:30 A.M. (the “Presentment Date”)**.

PLEASE TAKE FURTHER NOTICE, objections or other responses, if any, to approve a Stipulation and Order must be filed with the Clerk of the Bankruptcy Court electronically at www.nyeb.uscourts.gov and a copy of the objection must be served upon counsel for the Debtors, Law Offices of Francis E. Hemmings PLLC, 228-18 Mentone Avenue, Laurelton, NY 11413, and the United States Trustee’s Office, Eastern district of New York, U.S. Federal Office Building, 201

Varick Street, Suite 1006, New York, NY 10014 so as to be received at least 7 days prior to the date set for presentment of the proposed order. (Objection Date: December 24, 2024).

PLEASE TAKE FURTHER NOTICE, that if no responses or objections are received, the Motion may be approved without further notice or a hearing. If an objection has been timely filed, the court will notify the moving and objecting parties of the date and time of the hearing.

DATED: Laurelton, New York
 October 18, 2024

/s/ Francis E. Hemmings

Francis E. Hemmings, Esq.
Law Offices of Francis E. Hemmings PLLC
228-18 Mentone Avenue
Laurelton, NY 11413
(212) 747-9564

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

In re:

FRALEG JEFFERSON CORP.,

Debtor.

Case No.: 22-41125-ess

Chapter 11

**APPLICATION FOR AN ORDER AUTHORIZING RETENTION OF
FRANCIS E. HEMMINGS, PLLC, AS DEBTOR'S COUNSEL**

**TO: THE HONORABLE ELIZABETH S. STRONG
UNITED STATES BANKRUPTCY JUDGE**

For the Application of Fraleg Jefferson Corp., (the "Debtor"), the Debtor and Debtor-in-Possession herein respectfully represents as follows:

1. On March 14, 2024, (the "Filing Date") the debtor filed a petition for relief under chapter 11 of the Bankruptcy Code commencing the above-captioned chapter 11 bankruptcy case (the "Bankruptcy Case"). This petition was filed pro se. Pursuant to Sections 1107(a) and 1108 of the Bankruptcy code, the Debtor has continued in possession of its property as a Debtor-in-Possession. No trustee or examiner has been appointed.

2. Pursuant to Section 327 of the Bankruptcy Code and Local Rule 2014, the Debtor has selected and, subject to this Court's approval, authorized the employment of Francis E. Hemmings, Esq., and the Law Offices of Francis E. Hemmings PLLC (the "Firm") as its counsel to represent it and assist it in connection with this Bankruptcy Case.

3. The Debtor has selected Francis E. Hemmings, Esq., because of his experience in Chapter 11 reorganization cases, and the Debtor believes that Francis E. Hemmings, Esq., is qualified to represent the Debtor in this Bankruptcy Case.

4. Mr. Hemmings has been practicing in the area of bankruptcy since 2003. Mr. Hemmings has represented debtors in bankruptcy proceedings in New York.

5. The professional services which the Firm is to render is the general representation of the Debtor in this Bankruptcy Case under Title 11, United States Code, and the performance of such legal services for the Debtor which may be necessary herein.

6. The Debtor will require the firm to perform such legal services as may be necessary herein.

7. To the best of the Debtor's knowledge information and belief, the Firm has no connection with the Debtor, its principals, its creditors or any other party in interest in this Bankruptcy Case, except that the Firm has previously represented the Debtor's Principal in several real estate transactions and on a prior bankruptcy matter.

8. To the best of Debtor's knowledge, information, and belief the Firm does not currently hold or represent any interest adverse to the debtor or its estate and is a disinterested person under Section 101(4) of the Bankruptcy Code.

9. The Debtor desires to retain the law firm of Francis E. Hemmings PLLC, and specifically Francis E. Hemmings, Esq., under a general retainer because of the complex legal services that will be required. On **April 14, 2024**, an engagement agreement, of which a retainer payment of \$2,500.00 was paid to Mr. Hemmings by Krishawn Sampson, was entered into between the parties. The Engagement/Retainer Agreement is attached hereto as Exhibit "A".

10. The Debtor has drawn-down for pre filing date services the sum of \$2,500.00, and \$2,500.00 was left post-petition.

11. The Law Offices of Francis E. Hemmings PLLC has drawn down and applied the

retainer on account of the initial work done. In the future the Law Offices of Francis E. Hemmings PLLC shall make application for the payment and allowance of fees and disbursement pursuant to 11 U.S.C. §§ 331 and Fed. R. Bankr. P. 2016.

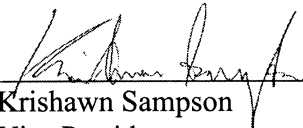
12. The employment of Francis E. Hemmings, Esq., and the Firm would be in the best interest of this estate.

13. No Chapter 11 reorganization trustee or official committee of creditors has been appointed herein.

14. No previous application for the specific relief requested herein has been made in this or any other Court.

WHEREFORE, the Debtor respectfully requests that an Order be entered authorizing the Debtor to employ and retain Francis E. Hemmings PLLC, effective **April 14, 2024**, under a general retainer to represent it as Debtor and Debtor-in-Possession in this Bankruptcy Case under Chapter 11 of the Bankruptcy Code; and granting any such further and additional relief as this Honorable court deems just and proper under the circumstances.

Dated: October 18, 2024
Queens, New York



Krishawn Sampson
Vice President
Debtor and Debtor-in- Possession

/s/ Francis E. Hemmings
FRANCIS E. HEMMINGS, ESQ.
FRANCIS E. HEMMINGS PLLC
Proposed Counsel to the Debtor
228-18 Mentone Avenue
Laurelton, NY 11413
(212) 747-9560
Fhemmings@gmail.com

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

_____X

In re:
FRALEG JEFFERSON CORP.,

Case No. 24-41125-ess

Chapter 11

Debtor.

_____X

ORDER AUTHORIZING RETENTION OF
FRANCIS E. HEMMINGS PLLC
AS DEBTOR'S COUNSEL

Upon the annexed application (the "Application") of FRALEG JEFFERSON CORP., (the "Debtor" or "Debtor-in-Possession") Debtor and Debtor-in-Possession herein, for an Order pursuant to Section 327 of the Bankruptcy Code, Bankruptcy Rule 3014, and Local Bankruptcy Rule 2014, effective the 14th day of April 2024, authorizing the retention of Francis E. Hemmings PLLC, under a general retainer as its counsel to represent the Debtor as Debtor-in-Possession in this Chapter 11 case, and upon the annexed affirmation of Francis E. Hemmings, principal of the Law Firm of Francis E. Hemmings PLLC, dated **October 18, 2024**, and it appearing that no notice of said Application need be given and no hearing on said Application is necessary; and no material adverse interest having been represented, and the Court being satisfied that the law firm of Law Offices of Francis E. Hemmings PLLC, represents no interest adverse to the Debtor or its estate in the matters upon which said firm of attorneys is to be engaged and is a disinterested person under Section 101(14) of the Bankruptcy Code, and that the employment of said firm of attorneys is necessary and would be in the best interest of the Debtor, it is

ORDERED, that the Debtor be, and hereby is, authorized and empowered to employ and retain, effective April 14, 2024 the law firm of Francis E. Hemmings PLLC, as its counsel to represent the Debtor as Debtor-in-Possession in the within proceedings under Chapter 11 of the Bankruptcy Code, and it is further

ORDERED, that ten business days prior to any increases in Francis E. Hemmings PLLC's hourly rates for any individual employed by Francis E. Hemmings PLLC and retained by the Debtor pursuant to Court Order, Francis E. Hemmings PLLC shall file a supplemental affidavit with the Court setting forth the basis for the requested rate increase pursuant to 11 U.S.C. § 330(a)(3)(F). Parties in interest, including the United States Trustee, retain all rights to object to or otherwise respond to any rate increase on any and all grounds, including, but not limited to, the reasonableness standard under 11 U.S.C. § 330; and it is further

ORDERED, that no compensation or reimbursement of expenses shall be paid to Francis E. Hemmings PLLC for professional services rendered to the Debtor, except upon proper application and by further Order of this Court following a hearing on notice pursuant to §§ 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules.

NO OBJECTION:

OFFICE OF THE UNITED STATES TRUSTEE
EASTERN DISTRICT OF NEW YORK

By: _____

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

In Re: X

FRALEG JEFFERSON CORP.,

Debtor.

X

Case No.: 24-41125-ess

Chapter 11

AFFIRMATION IN SUPPORT OF APPLICATION FOR AN ORDER
AUTHORIZING RETENTION OF FRANCIS E. HEMMINGS PLLC,
AS ATTORNEYS FOR DEBTOR AND DEBTOR IN POSSESSION

FRANCIS E. HEMMINGS, ESQ., under the penalty of perjury states:

1. I am an attorney at law admitted to practice before this Court, I am a principal of the Law Offices of Francis E. Hemmings PLLC (the "Firm"), and maintain offices at 228-18 Mentone Avenue, Laurelton, NY 11413.

2. I am qualified to represent Fraleg Jefferson Corp., (the "Debtor" or "Debtor-in-Possession") as Debtor and Debtor-in-Possession in its case under Chapter 11 of the Bankruptcy Code.

3. On April 14, 2024, the Debtor signed a retainer agreement with this Firm for this Chapter 11 case. A copy of the retainer agreement is attached hereto as Exhibit "A". Furthermore, on April 14, 2024, on behalf of the Debtor, Kirshawn Sampson paid, the sum of \$2,500.00 pursuant to that retainer agreement.

4. The Debtor understands and agrees that services rendered to the Debtor will be charged and billed at an hourly rate of \$400.00. The sum of \$2,000.00 of the retainer has been expended and drawn down post-petition of filing documents. A retainer balance of \$500.00 has been left and held in escrow. All future draw-downs against the retainer balance shall be made upon application to and approval by the Court.

5. Neither I, nor any associates, employees or agents of the Firm, have any connection with the Debtor, its principals, its creditors, or any other party in interest or their respective attorneys or accountants except that the Firm previously represented Andy Alege, President of the Debtor, in the purchase and sale of real property.

6. Neither I, nor any associates, employees or agents of the Firm, have or represent any interest adverse to the Debtor or the estate in the matters upon which the Firm is to be engaged.

7. Based upon the foregoing, my Firm is a "disinterested person" within the meaning of Section 101(14) of the Bankruptcy Code.

8. I am the attorney who will bear primary responsibility for the representation sought herein.

9. I have read and am generally familiar with Title 11, United States Code, the Bankruptcy Rules, and the Local Rules of the United States Bankruptcy Court for the Eastern District of New York.

10. I am competent to represent the interests of the Debtor in all proceedings now pending in this Court.

11. I have advised the Debtor of my willingness to serve as its counsel under general retainer based on time and standard billing charges.

Dated: October 18, 2024
Queens, New York

/s/ Francis E. Hemmings
FRANCIS E. HEMMINGS, ESQ.
Law Offices of Francis E. Hemmings PLLC
Proposed Counsel to the Debtor
228-18 Mentone Avenue
Laurelton, NY 11413
Tel.: (212) 747-9560

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

In re: X

Case No.: 24-41125-ESS

Chapter 11

FRALEG JEFFERSON CORP.

Debtor.
_____X

AFFIRMATION OF KRISHAWN SAMPSON

KRISHAWN SAMPSON, duly affirms under penalty.

1. I am the Vice President of Fraleg Jefferson Corp., the above captioned Debtor and Debtor-In-Possession. On April 14, 2024, I provided for a retainer in the amount of \$2,500.00 for the attorney's fees of Francis E. Hemmings, Esq., the prospective attorney for the Debtor-in-Possession prior to the filing of the Chapter 11 case.

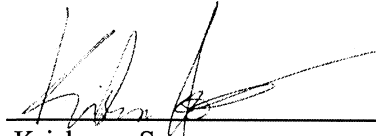
2. On March 14, 2024, the Debtor filed this chapter 11 case pro se.

3. The Debtor and I consent to this arrangement, and all factors regarding the nature of the representation have been fully disclosed to the Debtor. I and the Debtor understand that Mr. Hemmings and his firm will act solely on behalf of the Debtor-in-Possession and owes no duty or obligation to me.

4. I will not assert any claim against the Debtor's estate in connection with the above referenced retainer payment and the filing fees, and it will be considered to be a capital call.

5. I understand that all services will be rendered for and on behalf of the Debtor-in-Possession and no other party.

Dated: October 19, 2024



Krishawn Sampson

EXHIBIT A

FRANCIS E. HEMMINGSS PLLC

228-18 MENTONE AVENUE
Laurelton, New York 11413
Tel: (212) 747-9560; Fax: (212) 747-9564
Email: general@hemmingssnell.com

Chapter 11 Retainer Agreement and Representation Agreement

The undersigned, **FRALEG JEFFERSON CORP.**, (the "Debtor") herein, retains and employs Law Offices of Francis E. Hemmingss PLLC, to represent the Debtor in a case to be initiated under Chapter 11 of the Bankruptcy Code. The legal services to be rendered by Law Offices of Francis E. Hemmingss PLLC, are as follows:

- (1) preparation and filing of a Schedules, Statement of Financial Affairs and Statement of Executory Contracts;
- (2) attendance at all meetings of Creditors, Hearings, Pretrial Conferences, and trials in the case or any litigation arising in connection with the case, whether in State or Federal Court;
- (2) preparation, filing and presentation to the Court of any pleadings requesting relief;
- (4) preparation, filing and presentation to the Court of a Disclosure Statement and Plan of Reorganization under Chapter 11 of the Bankruptcy Code;
- (5) review of claims made by creditors or interest parties, preparation and prosecution of any objections to claims as appropriate; and
- (6) preparation and presentation of a final accounting and motion for a final decree closing the bankruptcy case.

In consideration of the legal services to be rendered FRALEG JEFFERSON CORP., by Law Offices of Francis E. Hemmingss PLLC, FRALEG JEFFERSON CORP., agrees to cause Law Offices of Francis E. Hemmingss PLLC to be paid the sum of Two Thousand Five Hundred Dollars (\$2,500.00) in cash or by bank check on April 14, 2024, or the date a petition is filed on behalf of FRALEG JEFFERSON CORP, whichever is sooner.

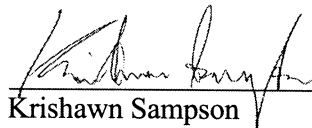
Any further legal services given outside of the scope of the above stated tasks, but related to this Bankruptcy Case, shall be billed at a rate of \$350.00 per hour.

It is understood that the Debtor, FRALEG JEFFERSON CORP., shall bear the responsibility for all postage incurred relating to its Chapter 11 filings and that the Debtor will escrow enough funds to cover postage for required mailings.

The undersigned understands and acknowledges that no guarantees of any specific result have been made by Law Offices of Francis E. Hemmings PLLC and acknowledges and agrees that Law Offices of Francis E. Hemmings PLLC, will utilize their best efforts to obtain approval and confirmation of a plan of reorganization or arrangement under Chapter 11 the Bankruptcy Code, but that Law Offices of Francis E. Hemmings PLLC, make no warranty or guaranty of approval or confirmation of such plan.

Signed and Agreed to on APRIL 14, 2024

FRALEG JEFFERSON CORP.



Krishawn Sampson
Vice-President